

O'NEILL / HASSEN

Attorneys at Law

January 23, 2025

Honorable Dale E. Ho
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *United States v. Allison Angarola*, 24 Cr 23 (DEH)

Dear Judge Ho:

I represent Ms. Angarola in the above-captioned matter. I write with the consent of the government to request that the Court adjourn the motions schedule for one month. Defense motions are currently due January 24, 2025; the government's response on February 14, 2025; and the defense's reply on February 28, 2025. A motions hearing is scheduled for March 14, 2025. I ask that these dates be adjourned for at least one month. Ms. Angarola consents to the exclusion of time pursuant to the Speedy Trial Act.

The parties are engaged in negotiations that the parties hope will resolve the matter without litigation or trial. I ask that the Court adjourn the motions schedule for one month to provide more time for us to resolve this matter. The government consents to this request for an adjournment. Ms. Angarola remains fully compliant with all the terms of her release.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Gráinne E. O'Neill

Application **GRANTED**. The motions schedule shall be adjourned for one month. Defendant Allison Angarola's motions will now be due on 2/24/2025. Government's responses are due on 3/17/2025. Defendant's replies are due on 3/31/2025. The motion hearing as to Ms. Angarola previously scheduled for 3/14/2025 is adjourned until **4/11/2025 at 3:00 p.m.** The motions schedule remains the same for Defendants Mark Angarola and Lisa Mincak. The Court hereby excludes time as to Ms. Angarola through 4/11/2025, under the Speedy Trial Act, 18 USC 3161(h)(7)(A). The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and the defendant in a speedy trial, because it will allow the parties to continue negotiations on a pretrial resolution. The Clerk of Court is respectfully requested to close ECF No. 96. **SO ORDERED.**

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Dale E. Ho
United States District Judge

New York, New York

Dated: January 24, 2025